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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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CC TO JUDGE DJ Judge Pechman

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AL SEATLE CHERKILS DISTRICT COURT WESTERN DISTRICT OF WASHINGTON DEPUTY

IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SHARON BORGSTROM)	NO. C00-986P (BJR)
Plaintiff,))	WTO Proceeding
V.))	STIPULATION AND ORDER TO EXTEND DISCOVERY CUTOFF
THE CITY OF SEATTLE,	<u>,</u>	AND PRETRIAL MOTIONS
a municipal corporation, et al.,)	FILING DATE
)	
Defendants.)	
)	

STIPULATION

COMES NOW the plaintiff, by and through her attorney, John R. Muenster, and the defendants, by and through their attorneys, Sean Sheehan and Stephen Larson, and stipulate that the discovery completion date in the above-entitled action may be continued to March 30, 2001, and that the pretrial motions filing date may be continued to April 12, 2001. In support of this stipulation, counsel for the parties present the following:

STIPULATION AND ORDER - 1

MUENSTER & KOENIG
JOHN R. MUENSTER, INC., P.S.
999 THIRD AVE., SUITE 4100
SEATTLE, WASHINGTON 98104

(206)467-7500 FAX: (206)467-0101

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- (1) The current discovery completion date is March 5, 2001. The current date for filing pretrial motions is March 15, 2001.
- (2) The parties are in the process of scheduling depositions of the plaintiff and the police officers in this case. An extension is necessary due to the schedules of counsel and the officers.
 - (3) The parties need more time to prepare and exchange documentary discovery.
- (4) The extension of time requested herein will facilitate the completion of discovery and preparation of motions.

DATED this the May of March, 2001.

Respectfully submitted,

MUENSTER & KOENIG

JOHN R. MUENSTER

WSBA No. 6237 Attorney at Law

Of Attorneys for Plaintiff

1	
2	STAFFORD FREY COOPER
3	
4	By: See attached fax authorization
5	STEPHEN LARSON Attorney at Law
6	WSBA No. 4959
7	SEATTLE CITY ATTORNEY'S OFFICE
8	
9	$_{ m By:}$ See attached fax authorization
10	SEAN SHEEHAN
11	Assistant City Attorney WSBA No. 6364
12	
13	Of Attorneys for Defendants
14	<u>ORDER</u>
15	Based upon the foregoing stipulation, the Court finds that the continuance requested
16	herein is appropriate. Accordingly, it is hereby ordered as follows:
17	(1) The discovery completion date in this matter shall be March 30, 2001.
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27	MUENSTER & KOENIG
28	STIPULATION AND ORDER - 3 JOHN R. MUENSTER, INC., P.S 999 THIRD AVE., SUITE 4100 SEATTLE, WASHINGTON 98104 (206)467-7500 FAX: (206)467-0101

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2	(2) Any pretrial motions described in Local Civil Rule 16(g) shall be filed on or
3	before April 12, 2001.
4	DATED this the
5	
6	Babara Cothetern
7	UNITED STATES DISTRICT JUDGE
8	Presented by:
9	MUENSTER & KOENIG
10	
11	By: Phaster
12	JOHN R. MUENSTER
13	WSBA No. 6237 Attorney at Law
15	Of Attorneys for Plaintiff
16	STAFFORD FREY COOPER
17	
18	$\mathrm{By}_{:}$ See attached fax authorization
19	STEPHEN LARSON Attorney at Law
20	WSBA No. 4959
21	SEATTLE CITY ATTORNEY'S OFFICE
22	
23	By: See attached fax authorization
24	SEAN SHEEHAN Assistant City Attorney
25	WSBA No. 6364
26	Of Attorneys for Defendants
27	STIPULATION AND ORDER - 4 STIPULATION AND ORDER - 4 ORDER - 4 JOHN R. MUENSTER, INC., P.S. 999 THIRD AVE., SUITE 4100 SEATTLE, WASHINGTON 98104
28	SEATTLE, WASHINGTON 98104 (206)467-7500 FAX: (206)467-0101

1	
2	STAFFORD FREY COOPER
3	
4	By: Tobin & Dal 29595 for
5	STEPHEN LARSON
6	Attorney at Law WSBA No. 4959
7	SEATTLE CITY ATTORNEY'S OFFICE
8	
9	By:
10	SEAN SHEEHAN
11	Assistant City Attorney WSBA No. 6364
12	Of Attorneys for Defendants
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17	herein is appropriate. Accordingly, it is hereby ordered as follows:
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27	STIPULATION AND ORDER - 3 MUENSTER & KOENIG JOHN R. MUENSTER, INC., P.S. 999 THERD AVE., SUITE 4100
28	999 THIRD AVE., SUITE 4100 SEATTLE, WASHINGTON 98104 (206)467-7500 FAX: (200)467-0101

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1	1
2	STAFFORD FREY COOPER
3	
4	By:
. 5	STEPHEN LARSON
6	Attorney at Law WSBA No. 4959
7	
8	SEATTLE CITY ATTORNEY'S OFFICE
9	
10	By: Seen Jell
11	SEAN SHEEHAN
12	Assistant City Attorney WSBA No. 6364
	Of Attorneys for Defendants
13	1
14	ORDER
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28	STIPULATION AND ORDER - 3 MUENSTER & KOENIG JOHN R. MUENSTER, INC., P.S. 990 THRD AVE., SUITE 4100 FEAT ILE, WASHINGTON WEIGH FAX: (200)467-7500 FAX: (200)467-7500

1 Any pretrial motions described in Local Civil Rule 16(g) shall be filed on or **(2)** 2 3 before April 12, 2001. DATED this the _____ day of March, 2001. 5 8 7 UNITED STATES DISTRICT JUDGE a Presented by: 9 MUENSTER & KOENIG 10 11 Mayter 12 OHN R. MUENSTER 13 WSBA No. 6237 Attorney at Law 14 Of Attorneys for Plaintiff 15 STAFFORD FREY COOPER 16 17 18 STEPHEN LARSON 19 Attorney at Law WSBA No. 4959 20 SEATTLE CITY ATTORNEY'S OFFICE 21 22 23 24 SEAN SHEEHAN Assistant City Attorney 25 WSBA No. 6364 26 Of Attorneys for Defendants 27 STIPULATION AND ORDER - 4 JOHN R. MUENSTER, INC., P.S. 299 THIRD AVE., SUITE 4100 SEATTLE, WASHINGTON 98104 (206)467-7500 FAX: (206)467-0101 28

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